

1 **GREGORY G. GORDON, LTD**
2 Gregory G. Gordon, State Bar No. 5334
3 ggordonltd@hotmail.com
4 871 Coronado Center Drive, Suite 200
5 Henderson, Nevada 89052
6 Ph: (702) 363-1072 / Fax: (702) 363-1084

7 **McCUNEWRIGHT LLP**
8 Richard D. McCune, *Pro Hac Vice*
9 rdm@mccunewright.com
10 Jae (Eddie) K. Kim, *Pro Hac Vice*
11 jkk@mccunewright.com
12 2068 Orange Tree Lane, Suite 216
13 Redlands, California 92374
14 Ph: (909) 557-1250 / Fax: (909) 557-1275

15 **THE KICK LAW FIRM, APC**
16 Taras Kick, *Pro Hac Vice*
17 taras@kicklawfirm.com
18 James Strenio, *Pro Hac Vice*
19 201 Wilshire Boulevard
20 Santa Monica, California 90401
21 Ph: (310) 395-2988 / Fax: (310) 395-2088

22 *Attorneys for Plaintiff Tonya Gunter and*
23 *the Putative Class*

24 **HOWARD & HOWARD**
25 **ATTORNEYS, PLLC**
26 James A. Kohl, Nevada Bar No. 5692
27 Robert Hernquist, Nevada Bar No. 10616
28 3800 Howard Hughes Pkwy., Suite 1000
29 Las Vegas, Nevada 89169
30 Telephone: (702) 257-1483
31 Facsimile: (702) 567-1568
32 jak@h2law.com
33 rwh@h2law.com

34 *Attorneys for Defendant United Federal*
35 *Credit Union*

36 **HOWARD & HOWARD ATTORNEYS PLLC**

37 **UNITED STATES DISTRICT COURT**
38 **FOR THE DISTRICT OF NEVADA**

39 TONYA GUNTER, individually, and on behalf
40 of all others similarly situated,

41 Plaintiff,

42 v.

43 UNITED FEDERAL CREDIT UNION, DOES
44 1-5 inclusive and ROE CORPORATIONS 6-10
45 inclusive,

46 Defendants.

47 Case No.: 3:15-cv-00483-MMD-WGC

48 Judge Miranda M. Du

49 **Stipulation for Extension of Time**

Stipulation for Extension of Time

Plaintiff Tonya Gunter (“Gunter”) and defendant United Federal Credit Union (“United”) (United and Gunter are collectively referred to as “the Parties”) by and through their respective counsel of record, stipulate for the Court to enter an Order amending the Scheduling Order (ECF 43). As the Parties previously informed the Court, this is a complex consumer class action case that requires extensive discovery not only with respect to written discovery, documents production and depositions, but also to the defendant credit union’s customer account database, which as a result of several mergers, involves multiple complex software platforms, requiring substantial expert witness involvement. United has gathered approximately 7,700 documents consisting of approximately 450,000 pages that are responsive to the 63 requests for production of documents that Plaintiffs propounded. Discovery on class issues prior to the filing of a motion for class certification has taken longer than expected, and indeed longer than a typical complex credit union overdraft fee case, and therefore, Plaintiff has granted an extension for Defendant to respond to her request for production of documents and special interrogatories from March 31 to May 27, 2016. Because of this additional complexity and the volume of documents with respect to discovery, the parties believe that they need additional time before Plaintiff can prepare a class certification motion. The parties submit the following deadlines:

1. June 16, 2016 at 10:00 a.m. – Telephone status conference with the Court;
 2. August 31, 2016 – Deadline to add parties, conduct class certification discovery, and to file a class certification motion;
 3. October 14, 2016 – Deadline for Defendant to file an opposition to the class certification motion;

1 4. November 18, 2016 – Deadline for Plaintiff to file a reply to the opposition to the class
2 certification motion.

3 If obstacles arise in meeting the above deadlines, then the parties are to discuss those issue
4 with the Court by setting up a status conference call with the Court or raising the issues at the
5 above-mentioned telephone status conference.

6 Dated: May 26, 2016

McCUNEWRIGHT, LLP

7 By: /s/ Jae (Eddie) K. Kim (with permission)
8 Richard D. McCune (*Pro Hac Vice*)
9 Jae (Eddie) K. Kim (*Pro Hac Vice*)

10 **GREGORY G. GORDON, LTD**
11 Gregory G. Gordon

12 **THE KICK LAW FIRM, APC**
13 Taras Kick
14 James G. Strenio

15 *Attorneys for Plaintiff Tonya Gunter
16 and the Putative Class*

17 Dated: May 26, 2016

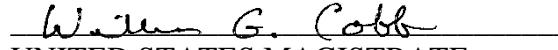
HOWARD & HOWARD ATTORNEYS, PLLC

18 By: /s/ James A. Kohl
19 James A. Kohl
20 Robert Hernquist

21 *Attorneys for Defendant United Federal
22 Credit Union*

23 **IT IS SO ORDERED:**

24 It is further ordered that the parties shall file a joint status report on or before June 14,
25 2016.

26 
27 UNITED STATES MAGISTRATE
28 JUDGE